CALIFORNIA COASTAL COMMISSION
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May 4, 2015

Coastal Development Permit De Minimis Waiver
Coastal Act Section 30624.7

Based on the project plans and information provided in your permit application for the development described below, the Executive Director of the Coastal Commission hereby waives the requirement for a Coastal Development Permit pursuant to Section 13238.1, Title 14, California Code of Regulations. If, at a later date, this information is found to be incorrect or the plans revised, this decision will become invalid; and, any development occurring must cease until a coastal development permit is obtained or any discrepancy is resolved in writing.

Waiver: 9-15-0417-W

Applicant: Southern California Edison Company

Location: 5000 PACIFIC COAST HIGHWAY (SAN DIEGO COUNTY)

Proposed Development: Replace SONGS current salt water cooling pumps with smaller dilution pumps, install 2 chillers that are not dependent on ocean water cooling, and reroute an effluent discharge pipe.

Background: Southern California Edison Company (SCE) proposes to install new salt water intake pumps and reconfigure cooling systems serving several buildings and equipment at San Onofre Nuclear Generating Station (SONGS) Units 2 and 3, on Camp Pendleton, in San Diego County. While SONGS was operational, SCE operated twelve large seawater pumps at Units 2 and 3 in order to supply the plant with cooling water and circulating water, amounting to a daily intake of 2.5 billion gallons of ocean water. Since the permanent shutdown of electricity generation in 2013, SCE has continued to maintain and operate four salt water cooling pumps (each with 17,000 gallons per minute capacity) in order to provide (a) cooling for the spent nuclear fuel pools, (b) cooling and ventilation for various buildings, systems and equipment, and (c) a source of dilution water used to comply with pollutant discharge requirements. At present, the maximum daily intake of ocean water is approximately 98 million gallons, or 4% percent of the full operational flow. Implementation of SCE's planned Spent Fuel Pool Islanding (SFPI) project, which would eliminate the use of seawater in the spent nuclear fuel cooling system, would further reduce ocean water intake needs at SONGS Units 2 and 3.[1]

[1] The SFPI cooling system relies on air-cooled chillers rather than seawater once-through cooling. This project is being reviewed by the Coastal Commission under a separate CDP waiver (CDP #9-15-0162-W), and will be reported to the Commission at the May 2015 meeting.

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Project Description: In response to the greatly reduced demand for seawater intake, SCE now proposes to replace the four existing salt water cooling pumps with four lower-capacity salt water pumps for the sole purpose of providing dilution water. In addition, SCE proposes to install a new underground discharge line for plant effluents and new air-cooled chillers to produce chilled water to support plant cooling and ventilation needs. The proposed system modifications would allow for further reductions in the volumes of ocean water intake and discharge (to 48 million gallons per day, or 2% of full operational flow), and reduce the operational footprint of the existing heating, ventilation and air conditioning (HVAC) system at SONGS Units 2 and 3.

Four salt water dilution pumps (7,350 gallons per minute capacity each) would be installed in place of the existing pumps (17,000 gpm each) in the Units 2 and 3 intake structures (two pumps per intake conduit) located inside the "tsunami gate" at the seaward edge of the SONGS site. The pump motors would be mounted on a platform within the tsunami gate, behind the SONGS seawall, and recessed approximately four feet below existing grade (+30 feet above mean low lower water). Pump intake piping would connect to and draw water from the existing Units 2 and 3 intake conduits. Each pump would draw water into a 16-inch stainless steel discharge pipe; the four discharge pipes would then combine into a single 20-inch pipe routed aboveground to connect to the Unit 2 offshore discharge conduit, where the seawater would serve to dilute the plant effluent stream. All four dilution pumps would discharge to the Unit 2 conduit.

A new 50-foot effluent discharge line is also proposed in order to connect existing sumps with the Unit 2 discharge structures. The underground installation of the discharge pipe would require approximately 500 cubic feet of excavation on previously-disturbed ground beneath the western plant perimeter road. Any excess excavated material would be reused on-site or disposed of in accordance with local regulations.

The two proposed air-cooled chillers (Carrier, model #30RAP045) would be installed on the rooftops of the Control and Unit 2 Fuel Handling Buildings. The first chiller would be used to provide air conditioning and ventilation for several buildings on-site, while the second chiller would be used to generate cold water needed to cool newly-installed electrical equipment in the Radwaste Building.

Waiver Rationale: For the following reasons, the proposed project will not have a significant adverse effect, either individually or cumulatively, on coastal resources, nor will it conflict with Chapter 3 policies of the Coastal Act:

- Marine Resources: Installation of the proposed saltwater dilution pumps would replace the existing set of larger-capacity pumps, while the new air-cooled chillers would provide cooling capacity currently provided by seawater intake. In combination with other projects, the proposed project is expected to reduce on-going adverse impacts to marine organisms by reducing the volumes of seawater intake and the discharge of used cooling water to the ocean.

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- Water Quality: Discharge of pollutants and contaminants to the ocean from the SONGS is currently governed by site-specific Offsite Dose Calculation Manual (ODCM) and National Pollutant Discharge Elimination System (NPDES) requirements. The proposed project would not alter these requirements, nor result in an increase in pollutant discharges above currently-permitted levels.

  Construction and excavation activities would comply with site-specific best management practices and the SONGS Storm Water Management Plan in order to control dust and loose soil, prevent and contain spills, limit stormwater runoff, and prevent solid materials from entering the ocean.

- Sensitive Habitats and Species: The proposed project would occur entirely within developed areas of the SONGS site, distant from any sensitive habitats or species.

- Visual Resources: Visual modifications associated with the proposed project would be very minor and in keeping with the industrial character of the SONGS site. The project would not block views to or along the coast from any public vantage point.

- Public Access: The proposed project would be located within the SONGS perimeter. No loss of coastal access would occur, and no adverse impacts to traffic on coastal access roads would occur during project construction.

This waiver will not become effective until reported to the Commission at their meeting on May 14, 2015, in Santa Barbara, and the site of the proposed development has been appropriately noticed, pursuant to 13054(b) of the California Code of Regulations. The Notice of Pending Permit shall remain posted at the site until the waiver has been validated and no less than seven days prior to the Commission hearing. If four (4) Commissioners object to this waiver of permit requirements, a coastal development permit will be required.

Charles Lester,
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cc: File